

EXHIBIT B

ORIGINAL TRANSCRIPT

STATES UNITED DISTRICT COURT

DISTRICT OF MASSACHUSETTS

C.A. NUMBER: 04-11924-RGS

IAN J. BROWN, JAMES BROWN AND BARBARA BROWN,
Plaintiffs,

VS

UNITED STATES OF AMERICA,
VERIZON NEW ENGLAND, INC. AND BOSTON EDISON
COMPANY D/B/A NSTAR ELECTRIC,
Defendants.

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RULE 30(b)(6) DEPOSITION OF ADRIENNE M.  
ST. JOHN, taken on behalf of the Defendants,  
pursuant to the applicable provisions of the  
Massachusetts Rules of Civil Procedure, before  
Laurie J. Driggers, a Certified Realtime  
Reporter, Registered Professional Reporter and  
Notary Public in and for the Commonwealth of  
Massachusetts, at the Offices of Prince, Lobel,  
Glovsky & Tye, LLP, 585 Commercial Street,  
Boston, Massachusetts, on April 13, 2005,  
commencing at 9:37 a.m.



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1 Q. -- would you travel on -- over  
2 South Road to access Hanscom Air Force  
3 Base?

4 A. No.

5 Q. Okay.

6 A. No.

7 Q. That would not be a direct route.

8 A. No.

9 Q. Okay. Can you describe for me  
10 Hartwell Road, generally?

11 A. Hartwell Road is a two-lane  
12 roadway. The eastern part of it has  
13 granite curbing and a sidewalk on the  
14 north side. It's through a residential  
15 area. There is some town-owned land off  
16 of Hartwell Road -- again, this is on the  
17 east side of Hartwell Road. The bottom --  
18 The southern part of Hartwell Road is  
19 surrounded by industrial buildings. It is  
20 also a two-lane, paved roadway. There are  
21 no sidewalks and there's no curbing. And  
22 then west of what we call Raytheon, it,  
23 again, is a two-lane, paved roadway  
24 through a very sparsely residential area.



1 MR. LEWIN: Okay. Copies  
2 for everyone. Could we mark these as an  
3 exhibit?

4 (Exhibit-12, MapQuest Maps,  
5 marked for identification).

6 BY MR. LEWIN:

7 Q. I'm showing you what's been marked  
8 as Exhibit 12. I'll represent to you that  
9 this is a map printed off the Internet.  
10 Do you recognize on the top sheet, what's  
11 depicted in that map?

12 A. (Witness viewing document). I do.

13 Q. Okay. And can you just show me on  
14 the map where Hartwell Road is?

15 A. Hartwell Road is this gray line  
16 that forms somewhat of a -- of a U  
17 (indicating).

18 Q. Okay. When I just asked you a  
19 question to describe Hartwell Road, you  
20 said it started out through a residential  
21 area. On the map, can you show me where  
22 the residential area you're talking about  
23 is?

24 A. The eastern residential area runs



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1 from a point here at South Road past Inde  
2 -- past a road labeled Independence Road  
3 to approximately this gray line running  
4 northwest that is unlabeled (indicating).

5 Q. That gray line, do you know what  
6 that is?

7 A. That's Bagley Avenue.

8 Q. Okay. And that residential area,  
9 are those privately owned residences?

10 A. They are.

11 Q. Okay. Okay. The next area you  
12 indicated was surrounded by industrial  
13 buildings on the south side.

14 A. And on the north side.

15 Q. And on the north side.

16 A. I didn't specify which side --

17 Q. Okay.

18 A. -- but both sides, yup.

19 Q. Okay. And can you show me what  
20 area of the road you're referring to here  
21 that's surrounded by industrial buildings?

22 A. Again, assuming that north is  
23 straight up on this paper, just west of  
24 Bagley Avenue --



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1 Q. Okay.

2 A. -- there is a facility, an  
3 industrial building. Just south of  
4 Hartwell Road, actually, under the word  
5 Hartwell Road, there is a hangar. And  
6 traveling further west, there's a -- an  
7 industrial facility on the south side and  
8 there's an industrial facility and a  
9 treatment facility on the north side  
10 (indicating).

11 Q. Okay.

12 A. There is a section of mil -- There  
13 is a section of homes -- mil -- military  
14 mobile homes in and along these roads that  
15 are not labeled north of Hartwell Road  
16 (indicating).

17 Q. All right. The first industrial  
18 facility that you located which was north  
19 was Hartwell Road, do you know what that  
20 facility is?

21 A. It's referred to as the Raytheon  
22 facility on the hill. It's, as I  
23 understand it, an old Naval weapons  
24 research facility.



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1 Q. Is that facility operational, to  
2 your knowledge?

3 A. Approximately two years it was  
4 closed down.

5 Q. Two years from now?

6 A. Roughly two years ago. I'm  
7 guessing at the time frame.

8 Q. Do you know when it was opened?  
9 Was -- Was that a Raytheon facility when  
10 it was functioning?

11 A. Raytheon was a tenant in the  
12 building, yes.

13 Q. And that was a civilian facility.

14 A. I don't know who worked there.

15 Q. Okay. And then you indicated that  
16 there is a hangar right below the word  
17 Hartwell Road on -- on this map.

18 A. Mm-hmm.

19 Q. Do you know who operates in that  
20 hangar?

21 A. Currently, I don't think anybody is  
22 in the hangar. I don't know who operated  
23 in there before. I don't know if it was  
24 Raytheon or Hanscom or Massport.



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1 Q. Do you know when that hangar went  
2 empty?

3 A. I believe they have been -- they  
4 abandoned both of them at the same time,  
5 so roughly two years ago.

6 Q. Okay. And then you indicated on  
7 those unnamed -- unlabeled streets on the  
8 map that there is some military housing;  
9 is that correct?

10 A. Yes.

11 Q. Okay. Do you know who owns that  
12 property?

13 A. Where the military houses are?

14 Q. Yeah.

15 A. That is part of Hanscom Air Force  
16 Base.

17 Q. Okay.

18 A. Whether or not it's owned by  
19 Massport or the U.S. Government, I don't  
20 -- I don't know.

21 Q. Okay. Then slightly further west  
22 on Hartwell Road, you indicated that there  
23 was -- I believe you said another facility  
24 south of Hartwell Road; is that correct?





1 A. Yes. The current Raytheon facility  
2 is located just south of Hartwell Road.

3 Q. And that is operational at this  
4 time.

5 A. Yes.

6 Q. Do you know if that is a civilian  
7 operation?

8 A. There are civilians who work there,  
9 yes.

10 Q. And then you indicated, I believe,  
11 that further -- what, I guess, would be  
12 north and west down Hartwell Road was  
13 sparsely residential. Is that what you  
14 said?

15 A. Yes. There is another industrial  
16 building on the north side of Hartwell  
17 Road just west of the military housing  
18 (indicating).

19 Q. Okay. And what is that facility?

20 A. I'm not sure who's in that  
21 building, but there's a couple of  
22 buildings there and the second building is  
23 a water treatment plant.

24 Q. And is the water treatment plant



1 operational?

2 A. As far as I know, yes.

3 Q. And is that owned by the Town of  
4 Bedford?

5 A. No.

6 Q. Do you know who owns or runs that  
7 facility?

8 A. I don't know which branch of the  
9 military owns it -- is running it.

10 Q. But one branch of the military runs  
11 that water treatment facility.

12 A. Yes. Yup.

13 Q. Okay. And is that -- Are those  
14 all of the industrial buildings that are  
15 located along Hartwell Road?

16 A. There might be some smaller out  
17 buildings, but those are the bulk of them,  
18 yes.

19 Q. Okay. As you proceed further north  
20 and west down Hartwell Road, what's  
21 located along the side of the road?

22 A. There's a couple of single-family  
23 homes on the east side of Hartwell Road.  
24 One of them is what's called the -- the



1 egg farm. And on the west side of  
2 Hartwell Road, there's a couple of  
3 single-family homes. There's a new street  
4 that's gone in, it's not shown on this  
5 map, called Sorens Way, and that has maybe  
6 about seven single-family lots.

7 Q. Do you know when that street was  
8 put in?

9 A. It's still under construction.  
10 They probably began about two years ago.

11 Q. Okay. The egg farm, what's the egg  
12 farm?

13 A. It's a small farm. It has a  
14 little grocery store where you can buy  
15 fresh produce, certainly eggs. There are  
16 some chickens that run around and there's  
17 the -- the show pig that -- a little  
18 attraction for the -- for the kids.

19 Q. Okay. For the residents located on  
20 the easterly side of Hartwell Road in the  
21 area where -- off of South Road, if they  
22 were coming on Route 62 from the left side  
23 of this map, what would be the most direct  
24 route to their homes?



1 A. Both.

2 Q. Okay.

3 A. There's a -- maybe a 200 -- You  
4 can come in from Washington Street on  
5 Beacon Street to a dead end and you can  
6 come in from Hartwell Road to Beacon  
7 Street on a dead end, and the two dead  
8 ends are two, 250 feet apart.

9 Q. If you lived on Beacon Street and  
10 you wanted to get to South Road, for  
11 example, could you travel from Beacon  
12 Street onto Hartwell Road?

13 A. Yes.

14 Q. You also mentioned that there was  
15 an egg farm on Hartwell Road.

16 A. Yup.

17 Q. Could you put EF where the egg farm  
18 is, again, on Exhibit 12A?

19 A. Egg farm is --

20 Q. And these are all approximate.

21 A. Yeah.

22 (Witness complied).

23 Q. And you said also earlier in your  
24 testimony that there were industrial



1 buildings along Hartwell Road. Could you  
2 put an IB in the areas -- area or areas  
3 where there are industrial buildings along  
4 Hartwell Road?

5 A. (Witness complied).

6 Q. You mentioned also that there was a  
7 Raytheon facility. Is that one of the IBs  
8 or industrial buildings --

9 A. It is.

10 Q. -- you depicted? Thank you. And  
11 I think you also mentioned there was some  
12 retail development somewhere along Hartwell  
13 Road.

14 A. You mean the egg farm?

15 Q. Is that what you meant when you  
16 said retail development?

17 A. There's a retail development on  
18 Concord Road --

19 Q. I see.

20 A. -- that I was describing in the  
21 area of Concord Road.

22 Q. Okay. All these marks you made on  
23 -- on Exhibit 12A regarding to industrial  
24 buildings, the egg farm, the residences,



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